

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LONG ZHANG,

Plaintiff,

v.

UAB EKOMLITA,

Defendant.

Case No. 1:22-cv-05057

Judge Marvin E. Aspen

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION

Plaintiff Long Zhang respectfully moves for entry of a preliminary injunction thereby enjoining Defendant UAB Ekomlita from further using in commerce any reproduction, counterfeit, copy, or colorable imitation of U.S. Trademark Registration Number 6,724,851 (the "HUUSK Mark") in connection with the sale, offering for sale, distribution, or advertising of knife goods which such use is likely to cause confusion, or to cause mistake, or to deceive. A Memorandum in support is concurrently filed.

DATED: October 12, 2022

Respectfully submitted,

By: /s/ Timothy Wang

David R. Bennett

DIRECTION IP LAW

P.O. Box 14184

Chicago, Illinois 60614

Tel: (312) 291-1667

dbennett@directionip.com

Of Counsel:

Timothy T. Wang

Texas Bar No. 24067927

twang@nilawfirm.com

NI, WANG & MASSAND, PLLC

8140 Walnut Hill Ln., Ste. 500

Dallas, TX 75231

Tel: (972) 331-4600

Fax: (972) 314-0900

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2022, Defendant was served with a copy of this document via email as per paragraphs 3 and 4 of the Temporary Restraining Order (Dkt. No. 13).

/s/ Timothy Wang

Timothy Wang